

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

DYFAN, LLC,

Plaintiff,

v.

TARGET CORPORATION,

Defendant.

C.A. No. 6:19-cv-00179-ADA

**DECLARATION OF CHRISTOPHER J. TYSON IN SUPPORT OF DEFENDANT’S
OPENING CLAIM CONSTRUCTION BRIEF**

1. I make this Declaration of my own free will.
2. I am an attorney with the law firm Duane Morris LLP and licensed to practice law in Virginia and Washington D.C.
3. I represent Defendant Target Corporation (“Defendant” or “Target”) and I submit this declaration in support of Defendant’s Opening Claim Construction Brief filed concurrently herewith.
4. Attached hereto as **Exhibit A** is a true and correct copy of U.S. Provisional Patent Application No. 61/517,584 (the “584 Provisional”) which I electronically retrieved from the records of the United States Patent and Trademark Office (“USPTO”).
5. Attached hereto as **Exhibit B** is a true and correct copy of U.S. Patent Application No. 13/410,197 (the “197 Application”) which I electronically retrieved from the records of the USPTO.

6. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from the United States Patent and Trademark Office (“USPTO”) File History for the ’197 Application which I electronically retrieved from the records of the USPTO.

7. Attached hereto as **Exhibit D** is a true and correct copy of excerpts from Newton’s Telecom Dictionary, 11th edition, July 1996.

8. Attached hereto as **Exhibit E** is a true and correct copy of excerpts from Merriam Webster’s Collegiate Dictionary, 10th edition, 1993.

9. Attached hereto as **Exhibit F** is a true and correct copy of excerpts from Dyfan’s First Set of Infringement Contentions for the ’899 Patent served on Defendant on June 14, 2019.

10. Attached hereto as **Exhibit G** is a true and correct copy of excerpts from Dyfan’s First Set of Infringement Contentions for the ’292 Patent on June 14, 2019.

11. Attached hereto as **Exhibit H** is a true and correct copy of Defendant’s Disclosures Regarding Proposed Claim Constructions served on Dyfan on August 27, 2019.

12. Attached hereto as **Exhibit I** is a true and correct copy of the Declaration of Dr. Benjamin Goldberg with Regard to Certain Claim Constructions dated September 25, 2019.

13. I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 26, 2019

s/ Christopher J. Tyson
Christopher J. Tyson